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June 16, 2016 16-NWP-105

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Ms. Stacy L. Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Re: *Nuclear Waste Program Guidance for Assessing Inspection Requirements in the Draft Hanford Facility Dangerous Waste Permit*, Revision 9 – WA7890008967, (Inspection Requirements – Conceptual Agreement Package), January 2016

0057117

Dear Mr. Smith and Ms. Charboneau:

Enclosed is a copy of the Inspection Requirements Conceptual Agreement Package (CAP). The Department of Ecology (Ecology) will use the CAP to review the draft *Hanford Facility Dangerous Waste Permit*, Revision 9 – WA7890008967.

In accordance with the Agreed Order No. DE-10156, Exhibit A, Section 1.12.1:

> "Within fourteen months after Ecology's transmittal of the Conceptual Agreement Packages to USDOE, USDOE agrees to submit to Ecology a Class 3 permit modification request to incorporate the SWOC Unit Groups into the Hanford Dangerous Waste Permit."

Ecology will transmit eleven CAPs to the United States Department of Energy (USDOE) in support of the Agreed Order No. DE-10156. This Inspection Requirements CAP is the sixth CAP submitted to USDOE.

If there are any questions regarding this letter, please contact me at john.price@ecy.wa.gov or (509) 372-7921. If there are any questions regarding the Inspection Requirements CAP, please contact Kelly Elsethagen, Site-wide Rev. 9 Permit Coordinator, at kelly.elsethagen@ecy.wa.gov or (509) 372-7913.

Sincerely,

Move for John Price

John B. Price
Tri-Party Agreement Section Manager
Nuclear Waste Program

kae/jt
Enclosure

RECEIVED
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EDMC

cc: See page 2

cc electronic w/enc:
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Environmental Portal
Hanford Facility Operating Record

cc w/enc:
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Administrative Record
NWP Central File

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Rod Skeen, CTUIR
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NWP Reader File

NUCLEAR WASTE PROGRAM GUIDANCE FOR ASSESSING INSPECTION REQUIREMENTS IN THE DRAFT HANFORD FACILITY DANGEROUS WASTE PERMIT REVISION 9 – WA7890008967

(Inspection Requirements - Conceptual Agreement Package)

January 2016

TABLE OF CONTENTS

1. OBJECTIVE

The purpose of the Conceptual Agreement Packages (CAPs) is to provide guidance to the Nuclear Waste Program (NWP) permit writers for reviewing the current draft *Hanford Facility Dangerous Waste Permit,* Revision 9, WA7890008967, (the Permit).

The CAPs will:

- Assist permit writers in identifying deficiencies and completing comment responses.
- Help identify where additional, supplemental or revised information needs to be provided in an updated/revised permit application.
- Provide guidance for development of a new draft permit, according to Washington Administrative Code (WAC) 173-303-840(7)(a) that will meet the NWP permitting criteria.

While the CAPs are to be used in reviewing the Permit, much of the Permit consists of permit application materials that were incorporated, with modifications as necessary. As a result, some of the citations in the Section 6, Regulatory Matrix Map used to evaluate permit adequacy originate from the Part B permit application requirements in WAC 173-303-806.

Some of the submitted permit application material was not incorporated into the Permit, but was retained in the Ecology Administrative Record (AR) as part of the Permit basis. The permit writer is expected to review application material used as a basis for a portion of the Permit. The Section 5, Unit Group Requirements Checklists, identify when the permit writer must review the permit application information maintained in the Ecology AR.

This CAP addresses inspection requirements that apply to Dangerous Waste Management Units (DWMUs) at the Hanford Facility.

2. NWP PERMITTING CRITERIA

Revisions to the Permit must meet the permitting criteria listed below. Once revisions are completed, the NWP will have a Permit that is:

- **Equivalent** – Ensures compliance with the Dangerous Waste Regulations, WAC 173-303, and protection of human health and the environment.
- **Consistent** – Applies regulations consistently throughout the Permit and across the entire authorized Washington State Dangerous Waste Program.
- **Enforceable** – Provides clear and specific requirements in the permit conditions.
- **Implementable** – Ensures permit requirements reflect facility conditions and permitted activities.

By using the CAPs, the permitting criteria will be met in the following ways:

Equivalent

The CAPs provide guidance to reviewers of the permit conditions, addenda, and corresponding permit application components. The guidance with help reviewers verify that the Permit meets all applicable Dangerous Waste Regulations and protects human health and the environment.

Each CAP includes a topic-specific regulatory matrix map of the Dangerous Waste Regulations that identifies where requirements are addressed in the Permit multi-tier structure.

Consistent

Each CAP includes a topic-specific checklist(s), and table of conceptual agreements reached in working meetings with the U.S. Environmental Protection Agency, Region 10 (EPA), and Ecology's Hazardous Waste and Toxics Reduction (HWTR) Program. The checklists and conceptual agreements are cross-walked on the regulatory matrix map for permit writers to complete and submit to the NWP's Site-wide Rev. 9 Permit Coordinator. The regulatory matrix map will be used to document adherence to NWP permit criteria or to document inconsistencies that will require revision before reissuing the final Permit.

To ensure consistency with the Washington State Dangerous Waste program, the CAPs are based on both the Dangerous Waste Regulations and the Washington State Department of Ecology's Dangerous Waste Permit Application Requirements (Publication # 95-402) guidance, as well as other applicable state and federal guidance.

Enforceable

The CAPs provide guidance for writing enforceable permit conditions and addenda and indicate how references in the Permit are properly incorporated.

Implementable

The CAPs provide guidance on writing clear and specific permit conditions and addenda that reflect actual facility conditions and describe the permitted dangerous waste management activities. With such conditions, the permittee compliance obligations will be clearly identified, enhancing Ecology's ability to evaluate permittee compliance status.

3. HANFORD FACILITY DANGEROUS WASTE PERMIT STRUCTURE

The Hanford Facility is one dangerous waste facility, with one dangerous waste permit. The current Hanford Facility dangerous waste permit is titled the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, WA7890008967.

When the Permit is reissued the title will change to the *Hanford Facility Dangerous Waste Permit*, Revision 9, WA7890008967.

The Hanford Facility has multiple DWMUs that treat, store, or dispose of dangerous or mixed waste. These DWMUs are either operating, closing, or are in post-closure. The DWMUs are organized administratively into multiple "unit groups," each of which are individual "chapters" in the Permit.

The structure is tiered into six main Parts as described below:

- **Part I** contains standard conditions found in all dangerous waste permits in the state of Washington. Part I also contains some conditions related to Hanford-specific legal agreements and circumstances.
- **Part II** contains general conditions that are specific to the Hanford Facility and apply to the facility as a whole.
- **Part III** contains operating unit group permit chapters for DWMUs that are still operating.[1] Each permit chapter contains:
  - Conditions specific to DWMUs in the unit group.
  - Addenda containing: Part A, waste analysis plan, process information, groundwater monitoring plan (if applicable), security, preparedness and prevention, contingency plan, training, inspection plan, closure plan, and post-closure plan (if applicable).
- **Part IV** contains conditions specific to corrective action for releases from solid waste management units, including releases to groundwater that are addressed on a groundwater operable unit basis.
- **Part V** contains closure unit group permit chapters for DWMUs in unit groups undergoing closure[2]. Each permit chapter contains:
  - Conditions specific to DWMUs in the unit group.
  - Addenda containing: Part A, groundwater monitoring plan (if applicable), process information/waste characteristics, security, training, inspection plan, closure plan, post-closure plan (if applicable).[3]
- **Part VI** contains post-closure unit group permit chapters for DWMUs in unit groups that have been closed with waste in place. Each permit chapter contains:
  - Conditions specific to DWMUs in the unit group.
  - Addenda containing Part A, groundwater monitoring plan, security (if applicable), training, inspection plan, and post-closure plan.[4]

The descriptions of the various Parts are general descriptions, and there are exceptions. For example, the PUREX chapter of the Permit is in Part V (Closure Unit), and the operating authorization for the PUREX tunnels DWMU appears there rather than in Part III (Operating Unit).

In addition, the Permit has several attachments containing information applicable at the Facility level. These attachments satisfy, in part, WAC 173-303 regulatory requirements. For example,

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[1] Some operating unit groups may contain DWMUs that are closing or have closed. However, the closing or closed DWMUs remain in Part III with the respective operating unit group.

[2] Some closure unit groups may contain DWMUs that are operating. However, the operating DWMUs remain in Part V with the respective closure unit group.

[3] Some information normally provided in separate addenda, (e.g., training, security, inspections, process information/waste characteristics) may be rolled into the closure plan.

[4] Some information normally provided in separate addenda, (e.g., training, security, inspections) may be rolled into the post-closure plan.

Attachment 4, *Hanford Emergency Management Plan*, DOE/RL-94-02, satisfies in part the contingency plan requirements of WAC 173-303-350 and WAC 173-303-360. The remainder of the contingency plan requirements for each unit group are satisfied by the unit group contingency plans (i.e., building emergency plans).

Together, the Permit conditions, addenda, and attachments must meet the WAC 173-303 Dangerous Waste Regulations applicable to permitted dangerous waste facilities.

4. HANFORD SPECIFIC AND OTHER GUIDANCE

This section discusses:

- The location of inspection requirements in the Permit structure.
- Applicability of these requirements to DWMUs in operating, closing, and post-closure unit groups.
- Hanford-specific differences related to these requirements.
- Applicable state and federal guidance.
- Conceptual agreements reached in workshops with EPA and HWTR.

4.1 Inspection Requirements in the Permit Structure

The inspection requirements for DWMUs in operating, closure, and post-closure unit groups are contained in the following Permit conditions and addenda:

- Permit Condition II.X Inspections.
- Permit conditions specific to inspection requirements in each Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group chapter.
- Addendum I, Inspection Requirements located in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group Permit chapters.
- Inspection requirements may be included directly in Addendum H, Closure or Addendum K, Post-closure if the units are in Closure (Part V) or Post-Closure (Partr VI).

4.2 Applicability of Inspection Requirements to DWMUs

This CAP is applicable to all DWMUs subject to inspection requirements in the following regulations:

- WAC 173-303-320, General inspection.
- WAC 173-303-340, Preparedness and prevention.
- WAC 173-303-380, Facility recordkeeping.
- WAC 173-303-395, Other general requirements.
- WAC 173-303-630, Use and management of containers.
- WAC 173-303-640, Tank systems.

- WAC 173-303-650, Surface impoundments.
- WAC 173-303-665, Landfills.
- WAC 173-303-680, Miscellaneous units.
- WAC 173-303-690, Air emission standards for process vents.
- WAC 173-303-691, Air emission standards for equipment leaks.
- WAC 173-303-692, Air emission standards for tanks, surface impoundments, and containers.
- WAC 173-303-695, Containment buildings.

Requirements pertaining to land treatment, waste piles, incinerators, drip pads, and dangerous waste munitions and explosives storage are not addressed, as these types of DWMUs are not included in the Permit.

This CAP also provides guidance for the corresponding information that must be provided per WAC 173-303-806 in Part B of the permit application, and that will be used as the basis for enforceable requirements of the Permit. These requirements are identified in the Section 6, Regulatory Matrix Map. WAC 173-303-806(4)(v) states that the Part B of a permit application must include a copy of the general inspection schedule required by WAC 173-303-320(2).

4.3 Hanford Differences for Inspection Requirements

Waste Treatment Plant Inspection Plan

Problem Statement: The Waste Treatment & Immobilization Plant (WTP), Operating Unit Group 10, does not have a complete inspection plan at this time. The WTP is still undergoing a phased design, permitting, and construction process, and as a result, not all design and operations information are available yet.

Discussion: The WTP is being permitted in phases. As a portion of the WTP is designed, it is submitted to Ecology for permitting. Once the design information is evaluated for compliance with WAC 173-303 requirements, it is incorporated into the Permit, and then that portion of the WTP may be constructed.

As a result of this phased permitting approach, not all the information required to complete the inspection plan was available when the initial construction permit was issued for the WTP. Under WAC 173-303-806(4)(a), Ecology is making allowance for submission of the remaining inspection plan information when construction is complete and the permit is modified to provide operating authorization for WTP DWMUs. The WTP Interim Compliance Schedule requires the permittee to submit an updated and final inspection plan prior to the facility being authorized to begin operations.

Construction on some of the WTP waste treatment buildings has either slowed down or stopped completely. Those buildings and the uninstalled equipment will need to be inspected on a regular basis for degradation and exposure due to long-term storage. Ecology has been working with the permittees to develop a preservation and maintenance plan, to ensure uninstalled equipment does not degrade; voiding completed integrity assessments. The preservation and maintenance plan and associated inspection records are currently kept in the Ecology

Administrative Record.
Ecology has communicated to the contractor BNI (Bechtel National Inc.) and DOE-ORP that this plan needs to go in the Permit now, and they need to get the document submitted as a permit modification request.

Resolution: Prior to the receipt of dangerous and/or mixed waste in the WTP, the Permittees will submit an updated inspection plan and associated inspection schedule to Ecology for review and approval. The revised and updated inspection plan will be submitted per the WTP compliance schedule, and will be incorporated into the Permit through a permit modification request.

4.4 Applicable State and Federal Guidance

Applicable state and federal guidance includes but is not limited to the following:

- Dangerous Waste Permit Application Requirements, Publication #95-402, revised November 2013.
- Technical Review Guidance Resource Compendium for Permits 2010, EPA.

4.5 Conceptual Agreements

The following Inspection Requirements Conceptual Agreements table includes conceptual agreements that were developed based on EPA and HWTR review of the Permit. The reference number in the first column corresponds to the comment number in the Review Comment Record (RCR) for the cited addenda. For example, CWC_EPA (Permit Conditions, Comment #22) means the EPA RCR for Central Waste Complex, Permit Conditions, Comment number 22. The checklist question number in the second column corresponds to the checklist question that addresses the conceptual agreement. The third column contains a description of the conceptual agreement.

The conceptual agreement reference number is cross-walked with the appropriate regulatory citation(s) in the Section 6, Regulatory Matrix Map. The SharePoint location for the EPA RCR comments on the Permit is:
http://partnerweb/sites/NWP/hdwp/Common/Forms/AllItems.aspx?RootFolder=%2fsites%2fNWP%2fhdwp%2fCommon%2fEPA%2dECY%20permit%20discussions%2fInput%2dcomments%2fEPA&FolderCTID=&View=%7b85D0C992%2dEB57%2d46F8%2d9E6F%2dACE184FC7461%7d.

The SharePoint location for the HWTR RCR comments on the Permit is:
http://partnerweb/sites/NWP/hdwp/Common/Forms/AllItems.aspx?RootFolder=%2fsites%2fNWP%2fhdwp%2fCommon%2fEPA%2dECY%20permit%20discussions%2fInput%2dcomments%2fHTWR&FolderCTID=&View=%7b85D0C992%2dEB57%2d46F8%2d9E6F%2dACE184FC7461%7d.

If the conceptual agreement is applicable to multiple inspection requirements addenda, it is noted. Permit writers are responsible for ensuring conceptual agreements are appropriately applied to their unit group inspection requirements addenda. The conceptual agreement table below is not comprehensive of all comment conceptual resolutions on the SharePoint system. Permit writers are responsible for reviewing all RCRs associated with their unit group and incorporating changes and recommendations agreed to with EPA and HWTR.

Inspection Requirements Conceptual Agreements

Ref. No.	Checklist Question #	EPA/HWTR Conceptual Agreements
216-S-10_EPA (Permit Conditions, Comment # 16) **CWC_EPA** ((Permit Conditions, Comment # 22) **Hexone_EPA** ((Permit Conditions, Comments #s 12, 13) **241-CX_EPA** ((Permit Conditions, Comment # 15) **T-Plant** ((Permit Conditions, Comment # 14.b) **LLBG Trenches 31 & 34** ((Permit Conditions, Comment # 12)	5.1-1 & 5.1-2	**Use consistent permit condition language for inspections:** Ensure the same inspection model Permit condition language is used consistently throughout the Permit. (Applicable to all unit group inspection permit conditions.)
216-S-10_EPA ((Permit Conditions, Comment # 16) **CWC_EPA** ((Permit Conditions, Comment # 24) **LLBG Green Islands** ((Permit Conditions, Comment # 9) **Hexone_EPA** ((Permit Conditions, Comment #s 12, 13) **241-CX_EPA** ((Permit Conditions, Comment # 15)	5.2-1 through 5.2-3	**Inspection requirements must be specified in the Permit:** Inspection requirements and inspection frequencies must be included in Addendum I, and be based on compliance with the corresponding regulations. Note: Closing units may include inspection requirements in the closure plan, and post-closure units in post-closure plan. (Applicable to all unit group inspection addenda.)
216-S-10_EPA ((Permit Conditions, Comment # 16) **CWC_EPA** ((Permit Conditions, Comment # 24) **LLBG Green Islands** ((Permit Conditions, Comment # 9) **Hexone_EPA** ((Permit Conditions, Comment #s 12, 13) **241-CX_EPA** ((Permit Conditions, Comment # 15)	None	**Enforceable permit conditions for inspection frequencies:** Any Permit conditions written to require a change in inspection frequency should be specific (e.g., in the event there is evidence of subsidence of the final cover, inspections will be increased from monthly to weekly). Avoid the use of vague, unenforceable language such as "In the event of any potential threats to human health or the environment…the inspection frequency will change from annually to quarterly." (Applicable to unit group inspection permit conditions.)
T-Plant_EPA ((Permit Conditions, Comment # 29); (Add. C, Comment #s 55, 59)	5.2-12	**Inspection requirements must be established in the Permit, and continue through closure, and post-closure (if applicable).** Inspection requirements must be documented in the Permit, and continue until certification of completion of closure is submitted to Ecology (and through post-closure if applicable). Ensure language through the Permit chapter is consistent with this requirement.

Ref. No.	Checklist Question #	EPA/HWTR Conceptual Agreements
		(Applicable to all unit group inspection addenda.)
CWC_HWTR (# 1)	5.2-13 through 5.2-16	**A consistent level of detail is needed for inspection addenda.** A consistent level of detail for the inspection schedules is needed throughout the permit, and must address the regulatory requirements applicable to each DWMU at the facility.
CWC_HWTR (# 1)	5.4-3	**The schedule for conducting tank integrity assessments over the life of the tank system must be included in the Permit.** The schedule for conducting tank integrity assessments over the life of the tank system must be included in the Addendum I inspection schedule. Note: Inclusion of future integrity assessments in the Addendum I inspection schedule may be incorporated by reference. (Applicable to tank systems)
CWC_HWTR (# 2)	5.2-18	**Facility inspection checklists contain the level of detail needed to satisfy inspection requirements, and should be included in the Permit.** The inspection checklists addressing inspections specific to each DWMU (or group of units) will be attached to Addendum I. Checklists will be required for inclusion in the dangerous waste inspection plan (addendum I). The inspection checklist will address all dangerous waste management areas. Note: See Technical Procedure SW-040-043 "Inspect CWC & Miscellaneous Buildings" in the Guidance Folder. Checklists are in Appendix A, just after Page 32.(Specific to CWC; applicable to all unit group inspection addenda.)
CWC_HWTR (# 2)	None	**Permit modifications are required for changes to the inspection addenda.** Changes to addendum I elements are managed through the permit modification process. (Applicable to all unit group inspection addenda.)
CWC_HWTR (# 4) **CWC_EPA** ((Permit Conditions # 34)	5.2-14 & 5.2-15	**Inspection schedules must include inspection frequencies and problems to look for during inspections.** For the large, outdoor boxes, the inspection schedule must include the inspection frequencies and problems to look for during inspections consistent with the EPA Consent Agreement and Final Order (CAFO) and Ecology Agreed Order (AO). (Specific to CWC; applicable to all unit group inspection schedules.)
CWC_HWTR (# 5)	5.2-21	**Inspection program needs to describe deficiency resolution process.** The permit needs to specify the process for documenting, prioritizing, resolving, tracking, and reporting deficiencies identified by inspections at each facility.

Ref. No.	Checklist Question #	EPA/HWTR Conceptual Agreements
CWC_HWTR (# 3)	5.3-1 through 5.3.-4	**Inspection frequencies for container storage areas must consider the criteria outlined in this conceptual agreement with HWTR.** The NWP will ensure inspection frequency of container storage areas is based on evaluation of the following criteria: • Areas subject to spills [WAC 173-303-320(2)(c)] (daily inspections required when subject to spills). See 95-402 permit application guidance to add language on what an "area subject to spills" is. • Is it in use? • Performance Standards [WAC 173-303-283] • Container inspection requirements [WAC 173-303-630 (6)] • Spills and discharges into the environment [WAC 173-303-145] (Specific to CWC; Applicable to unit groups with container storage areas, and other unit groups with DWMUs that have areas subject to spills.)
CWC_HWTR (# 6)	5.2-20 & 5.2-21	**Specific actions to be taken when deficiencies are identified during inspections must be included in the inspection addenda.** The actions necessary when inspections identify substandard conditions should be specific in the inspection plan (addendum I). The permit needs to specify the actions to be taken when inspections identify deficiencies. (Applicable to all unit group inspection addenda.)
T-Plant_EPA (Add. C, Comment # 67) **LLBG Trenches 31 & 34_EPA** ((Permit Conditions, Comment # 22)	5.1-1 through 5.2-3	**Consistent inspection information across the Permit:** To the extent language in other Permit addenda addresses inspections, ensure that language is consistent throughout the unit group Permit chapter, and specifically with the information in the inspection addenda. (Applicable to all unit group Permit chapters.)
T-Plant_EPA (Add. C, Comment # 91)	5.2-4	**Inspection plans must address all requirements for each type of DWMU in the unit group:** The inspection plan must address all inspection requirements associated with containment buildings, including inspection and maintenance of filtration devices associated with the monitoring of building air differential pressure. (Specific to T-Plant; potentially applicable to multiple unit group inspection addenda.)
LLBG Trenches 31 & 34_EPA ((Permit Conditions, Comment # 22); (Add. C, Comment # 32)	5.2-1 through 5.2-25, 5.6-1 & 5.6-2	**Inspection plans and schedules must address all requirements for each type of DWMU in the unit group:** A specific, detailed maintenance plan and inspection schedule must be established in the Permit. (Specific to LLBG Trenches 31 & 34; applicable to all unit group inspection addenda.)

5. UNIT GROUP REQUIREMENTS CHECKLIST FOR INSPECTION

The permit writer will use the following checklists to complete the Section 6, Regulatory Matrix Map and Deficiencies/Solutions Table. Refer to the applicable state and federal guidance documents listed in Section 4.4 as needed. Also refer to the Guidance folder in the SharePoint system for example inspection plans from the Emerald Services, Inc. Tacoma Facility. Any discrepancies must be noted in the Section 6, Regulatory Matrix Map, Deficiency column. When a conceptual agreement is associated with a checklist question, the permit writer must review the conceptual agreement in the Section 4.5, Inspection Requirements Conceptual Agreements table. If the inspection addenda is deficient for that checklist question, the conceptual agreement must be included as part of the proposed solution in the Section 6, Regulatory Matrix Map, Proposed Solutions column.

5.1 Unit Group Permit Conditions

1. Locate your Permit conditions file in the unit group Permit chapter. In the list of addenda, is Addendum I titled "Inspection Plan"? If no, make a note of the title.
2. Locate the inspection section of the unit group Permit conditions. Is the first Permit condition titled "INSPECTIONS"? If no, note the title.
3. Does the unit group Permit chapter contain the following standard inspection condition? "The Permittees will comply with the requirements of the Addendum I, Inspection Plan for each dangerous waste management unit subject to the requirements of this Chapter." If no, include the permit condition language used (if any).

5.2 General Inspection Plan Requirements

1. Does the unit group Permit chapter have an inspection plan? **Note:** If the unit group is a closure or post-closure unit, the inspection requirements may be included in the associated closure/post-closure plan. [WAC173-303-320; -340(1); -806(4)(a)(v)]
2. Is the inspection addendum titled "Addendum I, Inspection Plan" If No, list the Addendum Title.
3. Does the inspection plan include the following main elements? • Inspection plan description • Inspection schedules • Example inspection log(s) or summary • Schedules and description of procedures for remedying problems revealed by inspections

[WAC 173-303-320; -340(1); -806(4)(a)(v)]

Inspection Plan description, WAC 173-303-320; -340(1); -806(4)(a)(v)

4. Does the inspection plan describe the following items or groups of items to be inspected, including but not limited to:

   - Types of DWMUs to be inspected (e.g., container storage areas, aboveground tank systems, containment buildings, surface impoundments, miscellaneous units, landfills)
   - Areas subject to spills (e.g., loading/unload areas, transfer areas, staging areas, storage areas, process areas, treatment areas)
   - Monitoring equipment (e.g., overfill controls, leak detection, liquid level, temperature, pressure, flow meter)
   - Safety and emergency equipment (e.g., eye wash stations, safety showers, fire extinghishers, emergency lighting, uninterruptible power supply, communication equipment)
   - Security equipment (e.g., fences, signs, gates, locks, lighting)
   - Operating and structural equipment that help prevent, detect, or respond to hazards to public health or the environment (e.g., dikes, berms, ramps, tank supports, secondary containment, sumps, coatings, liners, bases/foundations, roofs, walls)

Note: To ensure all applicable items/groups of items are included in the inspection plan, review the facility description section of your unit group permit application, and the Addendum C, Process Information section in the unit group Permit chapter. If adequate detail is not provided in the Addendum C, Process Information section, review the process information section of the permit application as well (all permit application materials are located in the Ecology Library, Administrative Record). It is also helpful to review safety basis documentation associated with your unit group to identify "operating and structural equipment that help prevent, detect, or respond to hazards to public health or the environment."

[WAC 173-303-320; -340; -806(4)(a)(v)]

5. Does the inspection plan state that the Permittees will also respond to substandard conditions that were not anticipated?

[WAC 173-303-320; -340; -806(4)(a)(v)]

6. Does the inspection plan justify inspection frequencies for items not prescribed by the regulations?

Note: The frequency should be based on specific regulatory requirements, rate of possible deterioration of equipment, and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. The dangerous waste regulations usually specify the required inspection frequency, but for items not in the regulations, the inspection frequency must be justified.

Note: Check the permit application for your unit group in the Ecology Library for the inspection frequency basis if not prescribed by regulation. Work with your engineer to evaluate the justification.

[WAC 173-303-320(1), and (2)(a), (b), and (c); -340(1)(d); -806(4)(a)(v)]

7. Does the inspection plan describe where the written inspection schedule will be kept at the facility and identify the employee position(s) responsible for conducting inspections?

[WAC 173-303-320(1), and (2)(a), (b), and (c); -340(1)(d); -806(4)(a)(v)]

8. Does the inspection plan state inspection logs will be kept in the operating records for at least 5 years from the date of the inspection?

WAC 173-303-320(2)(d)

9. Does the inspection plan describe how problems revealed by an inspection will be remedied? For example:

- Repair cracks in the secondary containment or floor of a storage/treatment area
- Repair deterioration of joint seal compound or water stops (show that the compound used to repair the joint seal is resistant to the wastes stored in the area)
- Obtain needed supplies
- Respond to a leaking container
- Remove liquid from a sump or secondary containment
- Respond to leak detection or high-level alarms

Note: In some cases, part of the response to certain problems could include more frequent inspections for a period of time.

[WAC 173-303-320(3)]

10. Does the inspection plan describe the immediate actions that will be taken when a hazard is imminent, or has already occurred?

[WAC 173-303-320(3)]

11. Does the inspection plan identify which position(s) is (are) responsible for taking corrective action or ensuring other staff remedy the problem(s)?

[WAC 173-303-320(3)]

12. Does the inspection plan contain language indicating inspection requirements will continue until certification of completion of closure is submitted to Ecology (or until certification of completion of post-closure care is submitted to Ecology, as applicable)?

[WAC 173-303-320; -340; -806(4)(a)(v)]

Written Inspection Schedule, WAC 173-303-320(2)

13. Does the inspection plan contain a written inspection schedule(s) that includes the items or groups of items to be inspected from checklist question 5.2-4?

[WAC 173-303-320(2)(a)-(c)]

14. Does the inspection schedule identify the types of problems to look for during inspections? (e.g., wet spots, leaks, etc...) and describe the acceptable conditions of the items being inspected?

Note: When reviewing this section of the inspection schedule, there should be some details on "what to look for" and "where to look".

[WAC 173-303-320(2)(b)]

15. Does the inspection schedule specify the frequency of inspection for specific items on the schedule?

[WAC 173-303-320(1), and (2)(a), (b), and (c); -340(1)(d); -806(4)(a)(v)]

16. Are areas subject to spills inspected daily when in use?

Note: Waste in storage means that area is "in use." Inspections are required every day for storage areas that have waste. Load/unload areas are only "in use" when waste is present, or was present since the last inspection.

[WAC 173-303-320(1), and (2)(a), (b), and (c); -806(4)(a)(v)]

Inspection log, WAC 173-303-320(2)(d)

17. Does the inspection plan contain an example inspection log(s) or summary?

[WAC 173-303-320(2)(d)]

18. Do the inspection log example(s) include the following items to be completed during an inspection:

- The date and time of the inspection?
- The printed name and the handwritten signature of the inspector?
- A notation of the observations made?
- An account of spills or discharges in accordance with WAC 173-303-145?
- The date and nature of any repairs or remedial actions taken?

[WAC 173-303-320(2)(d)]

19. Is the inspection log(s) organized by location (e.g., container storage area "A") and by frequency (e.g., daily, weekly, monthly, quarterly)?

Note: Inspection logs can include additional information specified in WAC 173-303-320(1) and WAC 173-303-320(2)(a), (b), & (c). See examples.

[WAC 173-303-320(2)(d)]

Schedule for remedial action for problems revealed, WAC 173-303-320(3)

20. Does the inspection plan contain schedules for remedying problems revealed by the inspection?

[WAC 173-303-320(3)]

21. Do the schedules specify actual timelines for taking corrective measures for each type or category of problems that could be encountered?

Note: For example, the schedule should require remedies for certain types of conditions (e.g., a leaking container) be performed immediately; other remedies performed within 24 hours of detection (e.g., removing liquid from a sump); and others over a longer specified period, such as when there is no immediate hazard and remedy necessitates ordering more supplies or developing contracts for the work to be completed.

[WAC 173-303-320(3)]

Ignitable or reactive wastes, WAC 173-303-395(1)(d); -806(4)(a)(v)

22. Does your unit group contain DWMUs that store ignitable or reactive wastes?

Note: "Ignitable waste" means a dangerous waste that exhibits the characteristic of ignitability described in WAC 173-303-090(5). "Reactive waste" means a dangerous waste that exhibits the characteristic of reactivity described in WAC 173-303-090(7). Check your Part A for D001/D003 waste codes.

If "Yes", answer questions 22-24.

If "No", mark "Not Applicable" for the remaining questions 22-24 below.

[WAC 173-303-395(1)(d); -806(4)(a)(v)]

23. Does the inspection plan and schedule contain a requirement to annually inspect areas of the facility where ignitable or reactive wastes are stored?

[WAC 173-303-395(1)(d); -806(4)(a)(v)]

24. Does the inspection plan describe who is conducting the inspection?

24.a. Does the inspection plan demonstrate the person conducting the inspection is familiar with the International Fire Code?

24.b. If that person is not familiar with International Fire Code, is the inspection conducted in the presence of the local, state, or federal fire marshal?

Note: In order to demonstrate the inspector is familiar with International Fire Code, it should be in the job description and training requirement of the personnel training addendum (Addendum G) in the unit group Permit chapter.

[WAC 173-303-395(1)(d); -806(4)(a)(v)]

25. Does the inspection log or summary have the following information:

- Date and time of the inspection?
- Name of inspector or fire marshal?
- A notation of the observations made?
- Any remedial actions taken as a result of the inspection?

[WAC 173-303-395(1)(d)]

5.3 Container Storage Area Inspection Requirements

1. When containers are being stored in the container storage area, does your inspection plan and schedule require the following container storage area inspections daily:

- For leaks, spills, and accumulated liquids?

  Note: If the secondary containment structure is not sloped to drain liquids, the inspection plan must describe the procedure for checking the entire container storage area for leaks, including under the containers.

- To ensure that container labels are not obscured, removed, or otherwise unreadable?

  Note: WAC 173-303-630(3) Identification of containers. …The owner or operator must ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320.

[WAC 173-303-320(2)(c), WAC 173-303-630(3), WAC 173-303-630(6)]

2. When containers are being stored in the container storage area, does your inspection plan and schedule require the following container storage area inspections at least weekly (not more than 6 calendar days between inspection dates) for:

- Deterioration of containers (including corrosion and other factors) and of the secondary containment system?
- Cracks in the chemically-resistant coating or the foundation?

- Deterioration of coating and/or sealants?
- Dirt or other materials preventing inspection of protective coatings or foundations?

[WAC 173-303-320(2)(c), WAC 173-303-630(3), WAC 173-303-630(6)]

3. Does the inspection plan describe the actions taken to ensure that:

   - Spilled and leaked material will be immediately removed from secondary containment?
   - Removing rainwater and spilled material from sumps and other parts of secondary containment systems are adequate to prevent overflow?
   - Problems with container condition and container management will be properly remedied?
   - Problems with secondary containment or the base under containers are properly remedied? For example, does the inspection plan describe actions to repair cracks in secondary containment or the base under the containers?

   Note: This section should describe specific actions for removing rain water and spilled material from sumps and other parts of secondary containment. A reference to the response procedures in the case of a spill should be cited in this section of the inspection plan. Additionally, a timeframe should be specified for rainwater removal from sumps and secondary containment.

[WAC 173-303-320(3)]

4. In cases where containers are stored in buildings or under other protective coverings, does the inspection plan describe how the containers are stored to allow for adequate inspection under WAC 173-303-630(6)?

[WAC 173-303-630(7)(d)]

5.4 Tank System Inspection Requirements

1. Does the inspection plan adequately demonstrate the following:

1.a. The schedule and procedures for inspecting overfill controls such as level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank?

Note: A table that specifies each tank, its controls, and how each is inspected needs to be included with the inspection plan. The specific inspection methodology needs to be identified for each of the different types of overfill control/indicator equipment. (e.g. You may have three different types of level detection equipment). Each piece of monitoring equipment needs to have its own specified inspection frequency and procedure cited in the inspection plan. The inspection plan should have reference tables with operating parameters for the tank, such as specific gravity and pH. The inspector would use a combination of the operating parameters, tank change logs, waste analysis plan, and inspection schedule to inspect the tank with results getting documented in the inspection log.

1.b. Are the aboveground portions of the tank system inspected at least once each operating day to detect corrosion, weld breaks, punctures, or releases of waste?

Note: EPA Guidance EPA/530/K-05/018, September 2005 specifies that "each operating day" means every day the tank is in operation (i.e. storing or treating hazardous waste) and not necessarily just on the days the facility is open for business." This meaning of "each operating day" must be clearly documented in the inspection plan.

1.c. Is the data gathered from monitoring ~~any~~ and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) reviewed at least once each operating day to ensure the tank system is being operated according to its design?

Note: Inspection plan information satisfying the WAC 173-303-640(6)(b)(ii) requirement must address both monitoring and leak detection equipment. The WAC 173-303 December 2014 rule amendments include the typo "any" vs. "and" . This typo is inconsistent with federal inspection requirements in 40 CFR 264.195, has been flagged for correction, and will be included in the June 2017 WAC 173-303 rule amendments.

1.d. The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion, signs of releases of dangerous waste (e.g., wet spots, dead vegetation) are inspected each operating day?

Note: WAC 173-303-320 requires the owner or operator to remedy any deterioration or malfunction he finds. Verify the remedy section of the inspection plan includes remedies for problems revealed by tank system inspecitons.

[WAC 173-303-640(6)(a)(b) and (c), (7); -806(4)(v)]

2. Does the tank system have a cathodic protection system?

2.a. If yes, is proper operation of the cathodic protection system confirmed annually?

2.b. If yes, are all sources of impressed current inspected and/or tested, as appropriate, at least every other month (bimonthly, no more than 60 days between inspections)?

Note: The practices described in the National Association of Corrosion Engineers (NACE) standard, *Recommended Practice (RP-02-85)--Control of External Corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems*, and the American Petroleum Institute (API) Publication 1632, *Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems*, may be used, where applicable, as guidelines in maintaining and inspecting cathodic protection systems.

[WAC 173-303-640(6)(c), (c)(i), and (c)(ii)]

3. Does the inspection plan contain a schedule for conducting tank system integrity assessments over the life of the tank system?

3.a. Does the inspection plan describe the procedure for assessing the condition of the tank?

3.a.i. Consult with your engineer: Is the procedure adequate to detect corrosion, erosion, cracks, leaks, pitting, or wall thinning to less than sufficient shell strength and is it based on corrosion rate of tank sources?

3.b. Does the inspection plan describe the procedures for emptying the tank to allow adequate inspection of the interior to detect corrosion or erosion of the tank sides and bottom, or an alternate procedure if the tank system cannot be emptied and entered for inspection (e.g., leak test, visual examination with closed circuit television camera, ultrasonic testing)?

Note: If the inspection plan does not contain an integrity assessment schedule and procedure for conducting these assessments, it may be contained in the Addendum C, Process Information section of the Permit. Consult with your engineer for this review. Integrity assessment programs for the tank systems at the Hanford Facility are very complex due to the radioactive portion of the mixed waste, and usually have an entire program for evaluating integrity of the tank systems.

[WAC 173-303-640(2), (3); -806(4)(a)(v)]

5.5 Surface Impoundment Inspection Requirements

1. Does the inspection plan describe procedures for inspecting the surface impoundment weekly and after storms to detect evidence of any of the following:

   - Deterioration
   - Malfunctions
   - Improper operation of overtopping control systems
   - Sudden drops in the level of the impoundment's contents
   - Severe erosion or other signs of deterioration in dikes or other containment devices

[WAC 173-303-650(4)(b)]

2. Does the inspection plan and schedule describe how the leak detection system will be inspected?

Note: The amount of liquids removed from each leak detection system sump must be recorded at least once a week, and average daily flow rate calculated to verify the action leakage rate has not been exceeded. After the final cover is installed, this inspection frequency changes to at least monthly.

[WAC 173-303-650(4)(d), -650(10)(b)]

5.6 Landfill Inspection Requirements

1. Does the inspection plan describe procedures for inspecting the landfill weekly and after storms to detect evidence of any of the following:

   - Deterioration
   - Malfunctions
   - Improper operation of run-on and runoff control systems
   - Proper functioning of wind dispersal control systems
   - The presence of leachate in and proper functioning of leachate collection systems

[WAC 173-303-665(4)(b)]

2. Does the inspection plan and schedule describe how the leak detection system will be inspected?

Note: The amount of liquids removed from each leak detection system sump must be recorded at least once a week, and average daily flow rate calculated to verify the action leakage rate has not been exceeded. After the final cover is installed, this inspection frequency changes to at least monthly.

[WAC 173-303-665(4)(c)(i), -665(8)(b)]

5.7 Miscellaneous Unit Inspection Requirements

1. Are miscellaneous unit inspection requirements addressed in the inspection plan?

Note: Evaluate the miscellaneous unit to determine what inspection requirements in WAC 173-303 should be applied to ensure the unit is operated and maintained in a manner that will ensure protection of human health and the environment, including but not limited to design and operating requirements, detection and monitoring requirements, and requirements for responses to releases of dangerous waste or dangerous constituents from the unit.

[WAC 173-303-680(2), -680(3)]

5.8 Containment Building Inspection Requirements

1. Does the inspection schedule require the following to be inspected at least once every seven days:

1.a. Data gathered from any monitoring and leak detection equipment?

Note: Only applies if building is used to manage hazardous waste containing free liquids or if treatment standards requires the addition of liquids.

1.b. Collection and removal system (i.e., sumps) for the presence of liquids?

1.c. The containment building and area immediately surrounding the containment building to detect signs of releases of hazardous waste?

1.d. The containment building floor and primary barrier, looking for significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released?

1.e. The level of stored/treated hazardous waste within the containment building walls?

Note: Hazardous waste cannot be piled higher than the portion of the wall that meets the required design standards (containment walls) if the outer walls are used to support the piles of waste.

Segregated hazardous waste stalls (crowd walls) that prevent waste from contacting the containment walls at any time does not have a limit on height as long as the owner or operator can assure waste is always contained with the buildings containment walls.

1.f. The integrity and function of dust collection devices at all openings (i.e., windows and doors).

Note: Visible emissions from the containment building openings must be prevented at all times during routine operation and maintenance activities, including when vehicles and people enter or exit the unit.

Note: For Checklist Question 5.8-1.f., work with the Ecology Air Operating Permit subject matter expert to understand what's required for containment building air emission controls – both dangerous waste requirements and air permit requirements.

[WAC 173-303-695]

2. Does the inspection schedule include inspection of filtration devices associated with monitoring the buildings air differential pressure?

2.a. Does it include the basis for inspection frequency in the inspection plan, permit application, or other location?

[WAC 173-303-695]

6. REGULATORY MATRIX MAP OF INSPECTION PLAN REQUIREMENTS

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
Permit Format Consistency	Permit Conditions II.X	5.1-1	**216-S-10_EPA** (Permit Conditions # 16) **CWC_EPA** (Permit Conditions # 22) **Hexone_EPA** (Permit Conditions # 12, 13) **241-CX_EPA** (Permit Conditions # 15) **T-Plant** (Permit Conditions #14.b; Add. C 67) **LLBG Trenches 31 & 34** (Permit Conditions # 12 and 22) **T-Plant_EPA** (Add. C 67)					
Permit Format Consistency	Permit Conditions II.X	5.1-2	Same as above					
Permit Format Consistency	Permit Conditions II.X	5.1-3	None					

-806 Final facility permits. **(4)Contents of Part B.** Part B of a permit application must consist of the information required in (a) through (m) of this subsection. (a)(v) A copy of the general inspection schedule required by WAC 173-303-320(2): Include where applicable, as part of the inspection schedule, specific requirements in WAC 173-303-395 (1)(d), 173-303-630(6), 173-303-640 (4)(a)(i) and (6), 173-303-650(4), 173-303-655(4), 173-303-660 (4) and (5), 173-303-665(4), 173-303-670(7), and 173-303-680(3), and 40 C.F.R. 264.1033, 264.1035, 264.1052, 264.1053, 264.1058, 264.1064, 264.1067, 264.1084, 264.1085, 264.1086, and 264.1088. **-320 General Inspection.** **(1)** The owner or operator must inspect his facility to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or a threat to human health. The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment. **-320(2)** The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment. (a) The schedule must be kept at the facility; (b) The schedule must identify the types of problems which are to be looked for during inspections; (c) The schedule must indicate the frequency of inspection for specific items. The frequency should be based on the rate of possible deterioration of equipment, and the probability of an environmental or human health incident. Areas subject to spills must be inspected daily when in use. At a minimum the inspection schedule must also include the applicable items and frequencies required for the specific waste management methods described in …. In WAC 173-303-630 through 173-303-680, and 40 C.F.R. 264.1033, 264.1052, 264.1053, 264.1058 and 264.1083 through 264.1089 for final status facilities; **-340 Preparedness and Prevention** **(1) Required equipment.** All facilities must be equipped with the following, unless it can be demonstrated to the department that none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below: (a) An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel; (b) A device, such as a telephone or a hand-held, two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams; (c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and (d) Water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems. All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be	Addendum I	5.2-1	**216-S-10_EPA** (Permit Conditions # 16) **CWC_EPA** (Permit Conditions # 24) **LLBG Green Is.** (Permit Conditions # 9) **Hexone_EPA** (Permit Conditions # 12 and 13) **T-Plant_EPA** (Add. C 67) **241-CX_EPA** (Permit Conditions # 15) **LLBG Trenches 31 & 34_EPA** (Permit Conditions #22; Add. C 32)					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N** or **N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
tested and maintained as necessary to assure proper operation in time of emergency.								
Permit Format Consistency	Addendum I	5.2-2	**216-S-10_EPA** (Permit Conditions #16) **CWC_EPA** (Permit Conditions # 24) **LLBG Green Is.** (Permit Conditions # 9) **Hexone_EPA** (Permit Conditions #12, 13) **241-CX_EPA** (Permit Conditions # 15) **T-Plant_EPA** (Add. C 67) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320 **-340(1)** **-806(4)(a)(v)**	Addendum I	5.2-3	**216-S-10_EPA** (Permit Conditions # 16) **CWC_EPA** (Permit Conditions #24) **LLBG Green Is.** (Permit Conditions # 9) **Hexone_EPA** (Permit Conditions # 12, 13) **T-Plant_EPA** (Add. C 67) **LLBG Trenches 31 & 34_EPA**					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N** or **N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
			(Permit Conditions # 22) **241-CX_EPA** (Permit Conditions #15) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320 **-340(1)** **-806(4)(a)(v)**	Addendum I	5.2-4	**T-Plant_EPA** (Add. C 91) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320 **-340(1)** **-806(4)(a)(v)**	Addendum I	5.2-5	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(1) **-320(2)(a)-(c)** **-340(1)(d)** **-806(4)(a)(v)**	Addendum I	5.2-6	**LLBG Trenches 31 & 34_EPA** (Permit Conditions #22; Add. C 32)					
-320(1) **-320(2)(a)-(c)** **-340(1)(d)** **-806(4)(a)(v)**	Addendum I	5.2-7	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(2)(d) The owner or operator must keep an inspection log or summary, including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made, an account of spills or discharges in accordance with WAC 173-303-145, and the date and nature of any repairs or remedial actions taken. The log or summary must be kept at the facility for at least five years from the date of inspection.	Addendum I	5.2-8	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(3) The owner or operator must remedy any problems revealed by the inspection, on a schedule which prevents hazards to the public health and	Addendum I	5.2-9	**LLBG Trenches 31 & 34_EPA**					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
environment. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.			(Permit Conditions # 22); (Add. C 32)					
-320(3)	Addendum I	5.2-10	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(3)	Addendum I	5.2-11	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320 **-340** **-806(4)(a)(v)**	Addendum I	5.2-12	**T-Plant_EPA** (Permit Conditions # 29; Add. C 55, 59) **LLBG Trenches 31 & 34_EPA** (Conditions # 22; Add. C 32)					
-320(2)(a)-(c)	Addendum I	5.2-13	**CWC_HWTR** (Comment # 1) **LLBG Trenches 31 & 34_EPA** (Permit Conditions 22; Add. C 32)					
-320(2)(b)	Addendum I	5.2-14	**CWC_HWTR** (Comment # 1) **CWC_HWTR** (Comment # 4) **CWC_EPA** (Conditions 34) **LLBG Trenches 31 & 34_EPA** (Permit Conditions 22; Add. C 32)					
-320(1) **-320(2)(a)-(c)** **-340(1)(d)** **-806(4)(a)(v)**	Addendum I	5.2-15	**CWC_HWTR** (Comment # 1) **CWC_HWTR** (Comment # 4)					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
			CWC_EPA (Permit Conditions # 34) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(1) **-320(2)(a)-(c)** **-806(4)(a)(v)**	Addendum I	5.2-16	**CWC_HWTR** (Comment # 1) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(2)(d)	Addendum I	5.2-17	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(2)(d)	Addendum I	5.2-18	**CWC_HWTR** (Comment # 2) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(2)(d)	Addendum I	5.2-19	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(3)	Addendum I	5.2-20	**CWC_HWTR** (Comment # 6) **LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-320(3)	Addendum I	5.2-21	**CWC_HWTR** (Comment # 5) **CWC_HWTR** (Comment # 6)					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
			LLBG Trenches 31 & 34_EPA (Permit Conditions # 22; Add. C 32)					
-395(1) Precautions for ignitable, reactive, or incompatible wastes. (d) At least yearly, the owner or operator must inspect those areas of his facility where ignitable or reactive wastes are stored. This inspection must be performed in the presence of a professional person who is familiar with the International Fire Code, or in the presence of the local, state, or federal fire marshal. The owner or operator must enter the following information in his inspection log or operating record as a result of this inspection: (i) The date and time of the inspection; (ii) The name of the professional inspector or fire marshal; (iii) A notation of the observations made; and (iv) Any remedial actions which were taken as a result of the inspection. **-806(4)(a)(v)**	Addendum I	5.2-22	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-395(1)(d) **-806(4)(a)(v)**	Addendum I	5.2-23	**LLBG Trenches 31 & 34_EPA** (Permit Conditions # 22; Add. C 32)					
-395(1)(d) **-806(4)(a)(v)**		5.2-24	**LLBG Trenches 31 & 34_EPA** (Permit Conditions Comment # 22; Add. C 32)					
-395(1)(d) **-806(4)(a)(v)**		5.2-24.a	**LLBG Trenches 31 & 34_EPA** (Permit Conditions Comment # 22; Add. C 32)					
-395(1)(d) **-806(4)(a)(v)**		5.2-24.b	**LLBG Trenches 31 & 34_EPA** (Permit Conditions Comment # 22; Add. C 32)					
-395(1)(d)		5.2-25	**LLBG Trenches 31 & 34_EPA**					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
			(Permit Conditions Comment # 22; Add. C 32)					
WAC 173-303-320(2)(c) **-630 Use and management of containers.** **(3) Identification of containers.** The owner or operator must label containers in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public (Note—If there is already a system in use that performs this function in accordance with local, state or federal regulations, then such system will be adequate). The owner or operator must affix labels upon transfer of dangerous wastes from one container to another. The owner or operator must destroy or otherwise remove labels from the emptied container, unless the container will continue to be used for storing dangerous waste at the facility. The owner or operator must ensure that labels are not obscured, removed, or otherwise unreadable in the course of inspection required under WAC 173-303-320. **-630(6) Inspections.** At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors. The owner or operator must keep an inspection log including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made and the date and nature of any repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection.	Addendum I	5.3-1	**CWC_HWTR** (Comment # 3)					
WAC 173-303-320(2)(c) **WAC 173-303-630(3)** **WAC 173-303-630(6)**	Addendum I	5.3-2	**CWC_HWTR** (Comment # 3)					
WAC 173-303-320(3)	Addendum I	5.3-3	**CWC_HWTR** (Comment # 3)					
WAC 173-303-630(7)(d) The department may require generators to protect their containers from the elements by means of a building or other protective covering if the department determines that such protection is necessary to prevent a release of waste or waste constituents due to the nature of the waste or design of the container. The building or other protective covering must allow adequate inspection under subsection (6) of this section.	Addendum I	5.3-4	**CWC_HWTR** (Comment # 3)					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
-640 Tank systems. **(6) Inspections.** (a) The owner or operator must develop and follow a schedule and procedure for inspecting overfill controls. (b) The owner or operator must inspect at least once each operating day: (i) Aboveground portions of the tank system, if any, to detect corrosion or releases of waste; (ii) Data gathered from monitoring any leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; and (iii) The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion or signs of releases of dangerous waste (e.g., wet spots, dead vegetation). Note: WAC 173-303-320 requires the owner or operator to remedy any deterioration or malfunction he finds. Subsection (7) of this section requires the owner or operator to notify the department within twenty-four hours of confirming a leak. Also, 40 C.F.R. Part 302 may require the owner or operator to notify the National Response Center of a release. (c) The owner or operator must inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly: **-640(7)** Response to leaks or spills and disposition of leaking or unfit-for-use tank systems. **-806(4)(a)(v)**	Addendum I	5.4-1.a	None					
-640(6)(a)-(c) **-640(7)** **-806(4)(a)(v)**	Addendum I	5.4-1.b	None					
-640(6)(a)-(c) **-640(7)** **-806(4)(a)(v)**	Addendum I	5.4-1.c	None					
-640(6)(a)-(c) **-640(7)** **-806(4)(a)(v)**	Addendum I	5.4-1.d	None					
-640(6)(c) **-640(6)**(c)(i) The proper operation of the cathodic protection system must be confirmed within six months after initial installation and annually thereafter; and (ii) All sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).	Addendum I	5.4-2	None					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
-640(6)(c), (c)(i)-(ii)	Addendum I	5.4-2.a	None					
-640(6)(c), (c)(i)-(c)(ii)	Addendum I	5.4-2.b	None					
-640(2) Assessment of existing tank system's integrity. (a) For each existing tank system, the owner or operator must determine that the tank system is not leaking or is unfit for use. Except as provided in (b) of this subsection, the owner or operator must obtain and keep on file at the facility a written assessment reviewed and certified by an independent, qualified registered professional engineer, in accordance with WAC 173-303-810 (13)(a), that attests to the tank system's integrity by January 12, 1988, for underground tanks that do not meet the requirements of subsection (4) of this section and that cannot be entered for inspection, or by January 12, 1990, for all other tank systems. (b) Tank systems that store or treat materials that become dangerous wastes subsequent to January 12, 1989, must conduct this assessment within twelve months after the date that the waste becomes a dangerous waste. (c) This assessment must determine that the tank system is adequately designed and has sufficient structural strength and compatibility with the waste(s) to be stored or treated, to ensure that it will not collapse, rupture, or fail. At a minimum, this assessment must consider the following: (i) Design standard(s), if available, according to which the tank system was constructed; (ii) Dangerous characteristics of the waste(s) that have been and will be handled; (iii) Existing corrosion protection measures; (iv) Documented age of the tank system, if available (otherwise, an estimate of the age); and (v) Results of a leak test, internal inspection, or other tank system integrity examination such that: **-640(2)(e)** The owner or operator must develop a schedule for conducting integrity assessments over the life of the tank to ensure that the tank retains its structural integrity and will not collapse, rupture, or fail. The schedule must be based on the results of past integrity assessments, age of the tank system, materials of construction, characteristics of the waste, and any other relevant factors. **-640(3) Design and installation of new tank systems or components.** (a) Owners or operators of new tank systems or components must obtain (and for facilities that are pursuing or have obtained a final status permit, submit to	Addendum I	5.4-3	None					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
the department, at time of submittal of Part B information) a written assessment, reviewed and certified by an independent, qualified registered professional engineer, in accordance with WAC 173-303-810 (13)(a), attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of dangerous waste. The assessment must show that the foundation, structural support, seams, connections, and pressure controls (if applicable) are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste(s) to be stored or treated, and corrosion protection to ensure that it will not collapse, rupture, or fail. This assessment (which will be used by the department to review and approve or disapprove the acceptability of the tank system design at facilities which are pursuing or have obtained a final status permit) must include, at a minimum, the following information: (i) Design standard(s) according to which tank system(s) are constructed; (ii) Dangerous characteristics of the waste(s) to be handled; (iii) For new tank systems or components in which the external shell of a metal tank or any external metal component of the tank system will be in contact with the soil or with water, a determination by a corrosion expert of: **-806(4)(a)(v)**								
-640(2) **-640(3)** **-806(4)(a)(v)**	Addendum I	5.4-3.a	None					
-640(2) **-640(3)** **-806(4)(a)(v)**		5.4-3.a.i	None					
-640(2) **-640(3)** **-806(4)(a)(v)**		5.4-3.b	None					
-650 Surface impoundments. **-650(4)(b)** While a surface impoundment is in operation, it must be inspected weekly and after storms to detect evidence of any of the following: (i) Deterioration, malfunctions, or improper operation of overtopping control systems; (ii) Sudden drops in the level of the impoundment's contents; and (iii) Severe erosion or other signs of deterioration in dikes or other containment devices.	Addendum I	5.5-1	None					
-650(4)(d) The owner or operator must document in the operating record of the facility an inspection of those items in (a) through (c) of this subsection. The owner or operator must keep an inspection log including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made and the date and nature of any	Addendum I	5.5-2	None					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection. **-650(10)(b)** To determine if the action leakage rate has been exceeded, the owner or operator must convert the weekly or monthly flow rate from the monitoring data obtained under WAC 173-303-650 (4)(d) to an average daily flow rate (gallons per acre per day) for each sump. Unless the department approves a different calculation, the average daily flow rate for each sump must be calculated weekly during the active life and closure period, and if the unit is closed in accordance with WAC 173-303-650 (6)(b), monthly during the post-closure care period when monthly monitoring is required under WAC 173-303-650 (4)(d).								
-665 Landfills. **-665(4)(b)** While a landfill is in operation, it must be inspected weekly and after storms to detect evidence of any of the following: (i) Deterioration, malfunctions, or improper operation of run-on and runoff control systems; (ii) Proper functioning of wind dispersal control systems; and (iii) The presence of leachate in and proper functioning of leachate collection and removal systems.	Addendum I	5.6-1	**LLBG Trenches 31 & 34_EPA** ((Permit Conditions Comment # 22; Add. C 32)					
-665(4)(c)(i) An owner or operator required to have a leak detection system under subsection (2)(h) or (j) of this section must record the amount of liquids removed from each leak detection system sump at least once each week during the active life and closure period. **-665(8)(b)** To determine if the action leakage rate has been exceeded, the owner or operator must convert the weekly or monthly flow rate from the monitoring data obtained under subsection (2)(h) of this section to an average daily flow rate (gallons per acre per day) for each sump. Unless the department approves a different calculation, the average daily flow rate for each sump must be calculated weekly during the active life and closure period, and monthly during the post-closure care period when monthly monitoring is required under subsection (9) of this section.	Addendum I	5.6-2	**LLBG Trenches 31 & 34_EPA** ((Permit Conditions Comment # 22; Add. C 32)					
-680 Miscellaneous units. **-680(2) Environmental performance standards.** A miscellaneous unit must be located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. Permits for miscellaneous units are to contain such terms and provisions as necessary to protect human health and the environment, including, but not limited to, as appropriate, design and operating requirements, detection and monitoring requirements, and requirements for responses to releases of dangerous waste or dangerous constituents from the unit. Permit terms and provisions must include those requirements in WAC 173-303-630 through 173-303-670, 40 C.F.R. Subparts AA through CC, which are incorporated by reference at WAC 173-303-690 through 173-303-692, WAC 173-303-800	Addendum I	5.7-1	None					

[INSERT UNIT GROUP TITLE HERE]								
Inspection Regulatory Requirements in WAC 173-303	**Requirement location in Draft Rev. 9 Permit**	**Checklist Question #**	**Conceptual Agreement** *(See Section 4.5 Table)*	**DWMU Type (e.g., tank system, container storage area, surface impoundment, landfill, etc.)** *(Simple text only. No formatting or hard returns)*	**Requirement Met? Y, N or N/A**	**Deficiency (summary)** *(Simple text only. No formatting or hard returns)*	**Proposed Solutions (summary)** *(Simple text only. No formatting or hard returns)*	**Comments** *(Simple text only. No formatting or hard returns)*
through 173-303-806, part 63 subpart EEE (which is incorporated by reference at WAC 173-400-075 (5)(a)), and 40 C.F.R. Part 146 that are appropriate for the miscellaneous units being permitted. Protection of human health and the environment includes, but is not limited to: **-680(3) Monitoring, analysis, inspection, response, reporting, and corrective action.** Monitoring, testing, analytical data, inspections, response, and reporting procedures and frequencies must ensure compliance with subsection (2) of this section, WAC 173-303-320, 173-303-340(1), 173-303-390, and 173-303-64620 as well as meet any additional requirements needed to protect human health and the environment as specified in the permit.								
-695 Containment buildings. The requirements for containment buildings at 40 C.F.R. Part 264 Subpart DD are incorporated by reference. The words "regional administrator" will mean "department." The sentence at 40 C.F.R. 264.1101 (c)(2) is modified by changing "qualified Professional Engineer" to "independent qualified registered professional engineer."	Addendum I	5.8-1	None					
-695	Addendum I	5.8-1.a	None					
-695	Addendum I	5.8-1.b	None					
-695	Addendum I	5.8-1.c	None					
-695	Addendum I	5.8-1.d	None					
-695	Addendum I	5.8-1.e	None					
-695	Addendum I	5.8-1.f	None					
-695	Addendum I	5.8-2	None					
-695	Addendum I	5.8-2.a	None					

APPENDIX A - FACILITY SPECIFIC CLASSIFICATIONS

Operating Unit Groups	Tank System (1)	Surface Impound (2)	Landfill (3)	Container Storage (4)	Misc. Unit (5)	Inspection Plan
IDF			X	X		X
LERF & ETF	X	X		X		X
242-A- Evaporator	X					X
DSTs	X					X
325 Hazard Waste Treatment	X			X		X
WESF					X	X
CWC				X		X
WRAP				X		X
400-Area WMU				X		X
222-S	X			X		X
LLBG Trench 31 & 34			X	X		X
T-Plant Complex	X			X	X	X
LLBG Trench 94			X			X
WTP	X			X	X	X[d]
Closure and Post-Closure Unit						
1301-N Liquid Waste Disposal		X				X
B Plant Complex	X			X		X
PUREX	X				X	X
Hexone Storage and Treatment	X			X		X[a]
NRDWL			X			X[a]
207-A So. Ret. Basin		X				X[a]
216-B 63 Trench		X				X[a]
216-A 29 Ditch		X				X[a]
216-B-3 Pond		X				X[a]
216-A-37-1 Crib					X[b]	X[a]
216-S-10 Pond & Ditch		X				X[a]
241-CX Tanks	X					X[a]
LLBG Green Islands			X			X[a]
216-A36-B Crib					X[b]	X[a]
1325-N Liquid Waste Disposal		X				X[a]
1324-N & NA		X				X[a]
SSTs	X					
600-Area Purgewater					X	
1706-KE Waste Treatment	X					
324 Building					X[c]	
300 Area Process Trenches		X				
183-H Solar Evaporator Basin	X					

Footnotes:
(a) Inspection plan only includes a brief inspection schedule.
(b) Further analysis has identified these two unit groups as miscellaneous.
(c) A Part A has not been submitted for this unit group, however, we anticipate that it will be closed as a miscellaneous unit.
(d) Inspection Plan (Addendum I.) will be modified prior to WTP recieveing any waste.